

**REMARKS**

Applicants amend claim 1 and add new claims 21-24. Accordingly, claims 1-5, 18-24 are all the claims pending in the application.

***Claim rejections***

*Claims 1 and 18-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bianchi et al. (US publication No. 2003/0117499; hereinafter "Bianchi") and further in view of Herrod et al. (US Patent No. 6,405,049; hereinafter Herrod). Applicant traverses the rejection for at least the following reasons.*

**Claim 1**

Claim 1 recites, *inter alia*, "wherein when the external display means receives the operation code, the external display means selects to receive data from an external input apparatus." Applicants respectfully submit that Bianchi and Herrod do not disclose this unique feature of claim 1.

Bianchi discloses a digital camera 18 and a docking cradle 14 in which a user places the digital camera 18. The docking cradle 14 includes a wireless receiver 44 such as an infra-red (IR) receiver or a radio frequency (RF) receiver (page 3, paragraph [0035]-[0037]). In response to a command received from the user, the docking cradle 14 communicates with the digital camera 18 and the digital camera 18 sends information to be displayed on television (page 4, paragraph [0055]-[0056]).

Herrod discloses a portable data device and a cradle for receiving the portable data device. The portable data terminal 10 is inserted into a suitable recess 14 in the cradle 12. The cradle 12 is connected with a host system 15 (column 5, lines 33-42). Moreover, Herrod

discloses a remote link 22 provided to allow communication between terminal 10 and the cradle 12 (column 6, lines 9-16). However, Herrod and Bianchi do not disclose that when the external display means receives the operation code, the external display means selects to receive data from an external input apparatus.

In particular, Herrod merely discloses that the cradle interface 28 allows downloading of data stored in the terminal 10 to the cradle 12 as well as transfer of control or other data from the cradle 12 to the terminal 10. However, this does not disclose selecting to receive data from an external input apparatus based on the operation code received from the cradle.

Moreover, Applicant respectfully submits that claim 1 describes a particular relation between the cradle unit, the digital camera and an external apparatus. In particular, the transmitter of the cradle sends a wireless code to the external device when said digital camera selects the external display mode. Applicants respectfully submit that Bianchi discloses inserting a digital camera 18 into a docking system 14. Herrod discloses inserting a portable data device 10 (the alleged external device) into a cradle 12. If one of ordinary skill in the art combines the teachings of Bianchi and Herrod as alleged by the Examiner, the feature of the digital camera inserted in the cradle will no longer be present in the system because the alleged external device (the portable data device of Herrod) will be inserted into the cradle instead of the digital camera. Also, once the external apparatus is inserted into the cradle, the transmission is no longer wireless, as there is direct connection. That is, the combination would require one of ordinary skill in the art to replace the digital camera (Bianchi) with the portable data device (Herrod) as the device that is inserted into the cradle. This would eliminate at least two aspects required by claim 1.

Therefore, the resultant product of the combination would merely disclose only the external device being placed into the cradle, since it would be illogical for the combined teachings of Bianchi and Herrod to have both a digital camera and the external device inserted into the cradle, and in any event, no such combination is taught. For instance, the combination, as asserted by the Examiner would lack all three elements (digital camera, cradle and the external device) as defined by claim 1 in a relation as described therein. On the contrary, the combination only discloses either a digital camera inserted in the cradle or the alleged external device inserted into the cradle.

In view of the above, Applicant respectfully submits that Herrod and Bianchi, alone or in combination, do not disclose the unique features of the digital camera, cradle and the external device as recited in claim 1.

Furthermore, Applicant respectfully submits that, even if, *assuming arguendo*, Bianchi discloses a docked digital still camera with a review mode, the combination of Bianchi and Herrod still does not disclose sending operational code to an external device when the digital camera placed in the cradle unit selects an external display mode.

In particular, Bianchi merely discloses that the camera is in a picture review mode and does not disclose anything about an external display mode. That is, Bianchi does not disclose that said digital camera being capable of selecting an external display mode for displaying the image data on external display means. Applicants respectfully submit that a picture review mode at most discloses that pictures can be reviewed and does not disclose anything about a mode in which image data are displayed on an external display. Since, Bianchi does not even disclose an

external display mode, Bianchi consequently does not disclose selecting an external display mode. Herrod also does not disclose the feature recited above.

In view of the above, it is improper for the Examiner to allege that a camera being placed in a picture review mode discloses the limitation of external display mode in which the image data is displayed on an external means.

In addition, Applicants submit that one of ordinary skill in the art at the time the invention was made would not have modified the teachings of Bianchi to include the data output port as described by Herrod. Bianchi merely discloses that a digital camera can be docked into a docking station and wirelessly controlled through a wireless receiver provided on the docking station (page 2, paragraph [0017]). On the other hand, Herrod discloses a cradle unit 12 and portable terminal 10 where the portable terminal can either be directly connected to the cradle via a physical connection when inserted in to a suitable recess 14 or wirelessly connected using a remote link 22 (column 4, lines 33-column 6, lines 17). However, neither Bianchi nor Herrod disclose or fairly suggest why one of ordinary skill in the art would modify the system of Bianchi with the system of Herrod to provide a system as recited in claim 1.

Specifically, both references only disclose a one to one relation between a cradle unit and a portable device that is inserted into the recess of the cradle unit. However, Bianchi and Herrod, alone or in combination, do not disclose or fairly suggest a system in which one portable unit is inserted in the cradle and an external display device wirelessly connected to the cradle, and thus having a relationship as described in claim 1.

Furthermore, the Examiner asserts that it would have been obvious to a artisan to allegedly combine the teachings of Bianchi and Herrod because such incorporation not only

eliminates the burden to physically touch control buttons of the TV but also results in a simple circuit for infrared transmission which lower product costs and power consumption (page 3, 4-9 of the Office Action. However, in his reasoning for combining the references, the Examiner clearly uses impermissible hindsight in view of Applicants own disclosure, in an effort to fabricate the features as recited in claim 1. In other words, considering what the claim as a whole requires and what each reference teaches or suggests, and without mere hindsight picking or choosing particular elements from the prior art, Bianchi and Herrod do not teach or fairly suggest all the features as disclosed in claim 1.

In view of the above, Applicant respectfully submits that claim 1 is allowable over the cited references.

Claim 18

Applicant respectfully submits that claim 18 recites subject matter analogous to claim 1, and therefore is allowable for at least similar reasons claim 1 is shown to be allowable.

Claims 19 and 20

Applicant submits that claims 19 and 20 depend from claim 1, and therefore are allowable at least by virtue of their dependency and additional limitations therein.

Furthermore, claim 20 recites, *inter alia*, “wherein when said digital camera placed in said cradle unit selects said external display mode, an operation signal for activating the operation code generator is sent through the connection terminal.”

Applicants respectfully submit claim 20 requires that when the digital camera placed in the cradle unit, an operation signal for activating the operation code generator is sent through the

connection terminal. However, the combined teachings of Bianchi and Herrod do not disclose sending a operational signal through the connection terminal when the digital camera is placed in the cradle unit. On the contrary, when the teaching of Bianchi is modified by the teaching of Herrod, the digital camera will no longer is placed in the cradle; instead the alleged external device (the portable device of Herrod) would be linked to the cradle as described above. Therefore, it would be unreasonable for the combined teachings of the reference to disclose digital camera placed in said cradle unit selects said external display mode, an operation signal for activating the operation code generator is sent through the connection terminal.

*Claims 2-5 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bianchi and further in view of Herrod and Kuroiwa et al. (US Patent No. 5,715,020; herein after "Kuroiwa").* Applicant traverses the rejection for at least the following reasons.

#### Claims 2-5

Applicant respectfully submits that since claims 2-5 depend from claim 1 and since Kuroiwa does not cure the deficiency noted above with respect to claim 1, claims 2-5 are allowable at least by virtue of their dependency and additional limitations therein.

#### *New claims*

Applicants respectfully submit that claims 21-24 depend from claim 1, and therefore are allowable at least by virtue of their dependency and additional limitations therein.

With regard to claim 21, Applicants respectfully submit that Herrod and Bianchi, alone or in combination do not disclose that "when the external display means receives the operation code, the external display means selects to receive the image data from the digital camera

through a video output connector of the cradle unit, wherein the video output connector is connected to the external display means.”

***Conclusion***

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

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Date: March 31, 2008